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July 27, 2021

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: United States v. Kaleil Isaza Tuzman, S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

On behalf of Defendant Kaleil D. Isaza Tuzman, we respectfully submit this letter regarding Mr. Isaza Tuzman's July 30, 2021 sentencing hearing.

First, we submit as Exhibit A additional letters in support of Mr. Isaza Tuzman, some of which update materials previously filed in June 2018 (and are identified as such in the attached index), and others of which are new. We apologize for the lateness of this submission, which we have provided to the Court as soon as practicable in a single filing for ease of reference. We respectfully request that the letter attached as Ex. A-19 be filed under seal in its entirety, as it contains detailed personal medical information of Mr. Isaza Tuzman, and that the letter from Mr. Isaza Tuzman's sister Intiya, *see* Ex. A-22, be filed in redacted form as it contains highly personal information regarding an unrelated crime. We also provide herein an unredacted version of these letters to the Court and the government.

Second, Mr. Isaza Tuzman respectfully requests that Rabbi Yossi Bryski of The Aleph Institute be permitted to briefly address the Court at the upcoming sentencing hearing. The Aleph Institute is a non-profit organization that develops, on a pro bono basis, innovative programs and alternative sentencing opportunities for criminal defendants whom The Aleph Institute concludes "have demonstrated a genuine willingness to make positive changes in their lives." The Aleph Institute and its personnel have spoken at numerous sentencing proceedings in federal courthouses nationwide and have received recognition from judges, lawyers, and scholars as a helpful resources to courts in sentencing defendants. *See* Ltr. of Rabbi Yossi Bryski, ECF No. 1160-1, Ex. A-1. Rabbi Bryski has spoken at sentencing hearings before SDNY Judges Caproni, Koeltl, and Schofield, among other judges. In this case, Rabbi Bryski would speak to why the Aleph Institute has come to advocate for Mr. Isaza Tuzman, having concluded that he is a worthy candidate for the Court's mercy at sentencing.

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Finally, we request permission to show an approximately 20-minute video presentation during the sentencing hearing, which was developed through an Aleph Institute initiative with the sentencing advocacy organization Complete Picture. We believe that showing this video will streamline the sentencing proceeding and provide the Court with additional insight regarding Mr. Isaza Tuzman's history and characteristics under Section 3553(a). The video may also be accessed at this secure URL, for viewing in advance of the sentencing hearing: <https://vimeo.com/573220851>.¹

We thank the Court for its consideration.

Respectfully submitted,

Avi Weitzman

Avi Weitzman

cc. All Counsel of Record (publicly filed version via ECF)

¹ In order to protect the privacy of children in the video, we will send the password to access the video to Your Honor's Chambers via e-mail, copying the government, along with the fully unredacted version of this filing.